

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

<b>UNITED STATES OF AMERICA</b>	)	Criminal No.	5:21-CR-383	(DNH)
	)			
<b>v.</b>	)	<b>Superseding Information</b>		
	)			
<b>IVAN RODRIGUEZ,</b>	)	<b>Violation:</b>	21 U.S.C. § 846	
	)		[Conspiracy to Distribute and	
	)		Possess with Intent to	
	)		Distribute Controlled	
	)		Substances]	
	)			
	)		18 U.S.C. §§ 1957 and 2	
	)		[Engaging in a Monetary	
	)		Transaction in Criminally-	
	)		Derived Property]	
	)			
	)	<b>2 Counts and Forfeiture Allegation</b>		
	)			
<b>Defendant.</b>	)	<b>County of Offense:</b>	Oneida	

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**

**[Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances]**

From on or about May 2020, through on or about October 2021, in Oneida County in the Northern District of New York, and elsewhere, the defendant, **IVAN RODRIGUEZ**, conspired with others known and unknown to knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances which violation involved 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A).

**COUNT 2**  
**[Engaging in a Monetary Transaction in Criminally-Derived Property]**

On or about August 26, 2021, in Oneida County in the Northern District of New York, and elsewhere, the defendant, **IVAN RODRIGUEZ**, knowingly engaged in a monetary transaction by, through, and to a financial institution, in and affecting interstate commerce, in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, in that **IVAN RODRIGUEZ** paid another individual, whose initials are J.H.R., \$11,055 in cash to obtain an AmeriCU official bank check number 1390398, made payable to BMW Financial Services, to pay off a car loan for a 2021 BMW M4, knowing that these funds were derived from the unlawful distribution of a controlled substance, in violation of Title 18, United States Code, Sections 1957 and 2.

**FORFEITURE ALLEGATION**

The allegation contained in Count One of this superseding information is hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Upon conviction of the offense in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A), the defendant, **IVAN RODRIGUEZ**, shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, all right, title and interest in

any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations. The property to be forfeited includes, but is not limited to, the following:

(a) a money judgment in the amount of \$150,000.

**SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendant

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;


(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty,

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

Dated: December 7, 2022

CARLA B. FREEDMAN  
United States Attorney

By:   
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Tamara B. Thomson  
Assistant United States Attorney  
Bar Roll No. 515310